

## Comment Form

## STATE DEPARTMENT

Title: Hague Convention on Intercountry Adoption; Intercountry Adoption Act of 2000; Accreditation of Agencies; Approval of Persons; Preservation of Convention Records; Extension of Comment Period  
 Subject Category: Intercountry Adoption Act of 2000: Hague Convention-- Agency accreditation and person approval

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Phase: PROPOSED RULES

How To Comment:

Commenters may send hard copy submissions or comments in electronic format. Commenters sending only hard copies must send an original and two copies referencing docket number State/AR-01/96 or State/AR-01/98 to: U.S. Department of State, CA/OCS/PRI, Adoption Regulations Docket Room, SA-29, 2201 C Street, NW., Washington, DC 20520. Hard copy comments may also be sent by overnight courier services to: U.S. Department of State, CA/OCS/PRI, Adoption Regulations Docket Room, 2201 C Street, NW., Washington, DC 20520. Do not personally hand deliver comments to the Department of State. Comments referencing the docket number State/AR-01/96 or State/AR-01/98 may be submitted electronically to [adoptionregs@state.gov](mailto:adoptionregs@state.gov). Two hard copies of the comments submitted electronically must be mailed under separate cover as well. Electronic comments must be made in the text of the message or submitted as a Word file avoiding the use of any form of encryption or use of special characters. If you submit comments by hard copy rather than electronically, include a disk with the submission if possible. Hard copy submissions without an accompanying disk file, however, will be accepted.

Your comment has been sent. To verify that this agency has received your comment, please contact the agency directly. If you wish to retain a copy of your comment, print out a copy of this document for your files.

Please note your REGULATIONS.GOV number.

Regulations.gov #: EREG - 7

Date Submitted: Dec 14, 2003

Title	First Name	Last Name
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US

## Comment

The Hague Convention on Intercountry Adoption regs that have been presented are not realistic in the present form. 1) the requirement for one million dollars liability insurance is not realistic, nor even available to agencies. If this reg were to be adopted it would almost solicit law suits because it is so open ended and all inclusive...how does an agency become responsible for all activity in any country in the world? This reg alone would add between 3 and \$5000 to the cost of an adoption with small agencies. 2) The reg for accreditation is unrealistic for all agencies....small agencies could be put out of business due to the cost and administration of this certification process...why not allow the state DSS groups to do the certifying? Or make small agencies exempt and qualify with local authorities....state DSS or similar process....or let "big agencies" certify or "sponsor" smaller agencies ....again, this accreditation process will add 2 to \$5000 to the cost of an adoption for a small agency. Is that your intent? To add to the cost of adoptions? Or to eliminate small agencies (who often are the best service providers)? Surely the present Hague regs will do both of these things....increase costs (especially small agencies) and will be the demise of those small agencies that cannot and do not have the resources to engage in the accreditation process. Your consideration for my suggestions is appreciated. I have been at the hearings for the Hague regs and would be a welcome volunteer to help you in any way I can.

US

## Comment

To Whom it May Concern: As a sibling of six children who were adopted internationally and parent of a son who was adopted from Vietnam in 2001 and a daughter who was adopted from Morocco in 2003 I am very concerned about the implementation of the Hague Treaty in the United States. I have plans to adopt at least two more times, and I am very upset by the fact that this legislation could make the dreams for my family crumble. If the Hague Treaty were implented as written many small agencies would be forced to closed because they could not meet the financial requirements of the Hague. There is no market for the liability insurance required by the Hague. My mother owns and operates WORLDWIDE Adoption Services in Spartanburg, South Carolina. This agency meets the needs of many families in our community as well as other families across the country. They offer many post-placement and pre-placement support opportunities for families. It would be heartbreaking to see WORLDWIDE have to close as a result of this legislation. It would be devastating to know that they could not help children find their forever families. My wife and I recently visited Haiti where we were able meet with many orphans and it is unthinkable that they may never have forever families . Please reconsider this legislation and the implications that would result. Sincerely, Robert Matthew Ewing Dad to Robert Elias Ewing adopted from Vietnam in 2001 and Sami Victoria Ewing adopted from Morocco in 2003